

EXHIBIT H

CONTAINS CONFIDENTIAL INFORMATION

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

**DEFENDANT GOOGLE LLC'S SECOND SUPPLEMENTAL RESPONSES AND
OBJECTIONS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES (NOS. 1-10)**

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RESPONSE TO INTERROGATORY NO. 9:

Google incorporates its general objections above as though set forth in this response. Google further objects to this interrogatory on the grounds and to the extent that: (1) it calls for the premature disclosure of expert opinions and analyses; (2) it calls for, or may be construed as calling for, information protected from discovery by the attorney-client privilege, the work product doctrine, and/or common interest or joint defense privilege.

Subject to and without waiving the foregoing general and specific objections, Google responds as follows: Singular has the burden of proof in this case, including on the issue of damages. Google contends that it did not infringe the patents-in-suit and that Singular is not entitled to damages in this case. To the extent Google will offer any expert opinion related to a potential damages calculation here, this request is premature. Discovery in this case has only recently commenced. Google has yet to receive any documents or discovery responses from Singular, and fact discovery is not scheduled to close for nearly a year. Claim construction is still months away. Singular will presumably serve its damages expert's report more than a year from now on August 27, 2021. To the extent a rebuttal report is warranted, Google's is due September 24, 2021. Google reserves the right to amend this response as appropriate as the case progresses.

INTERROGATORY NO. 10:

Identify the five (5) past or present employees of Google most knowledgeable regarding Google's responses to the foregoing interrogatories.

RESPONSE TO INTERROGATORY NO. 10:

Subject to and without waiving the foregoing general objections, Google responds as follows: The following five individuals have knowledge regarding Google's responses to

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Singular's interrogatories numbers 1 through 9: Peter Brandt, Norm Jouppi, Andrew Phelps, Andrew Swing, Jennifer Wall. Although each of these individuals possess information related to one or more of Singular's interrogatories, none are necessarily knowledgeable as to all of the interrogatory responses provided here.

Dated: September 29, 2020

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